

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JERRY HICKMAN,

Plaintiff,

Case No. 18-cv-14057
Hon. Matthew F. Leitman

v.

CITY OF WESTLAND, et al.,

Defendants.

PROTECTIVE ORDER

The parties hereto having so stipulated, and the Court being otherwise fully advised in the premises,

IT IS HEREBY ORDERED as follows:

1. Any document produced by any party to this action (the "Producing Party") for inspection and/or copying by any other party (the "Discovering Party") shall be used by the Discovering Party only for the purposes of this litigation and for no other purpose. The Discovering Party shall not make such documents or the information contained therein available to any person except:

(a) Such employees of the Discovering Party as are involved in the prosecuting or defending of this action;

(b) Attorneys engaged or employed by the Discovering Party and their supporting staff;

(c) Any expert witness or consultant engaged by the Discovering Party or its attorneys to assist in connection with this action.

2. Nothing in paragraph 1 hereof shall prevent the parties from using documents received in discovery, or the information contained therein, in any proceeding in this action, including, but not limited to:

- (a) Discovery depositions;
- (b) Motions, briefs and pleadings;
- (c) Argument before the Court;
- (d) Trial or appeal.

3. Before making any documents produced herein, or the information contained therein, available to any person described in paragraph 1(c), the Discovering Party shall obtain from that person a written acknowledgment that he has been given a copy of this Order, has read it, and agrees to be bound by all of its terms.

4. At the conclusion of this litigation, all documents, including copies, produced in discovery and in the possession of the Discovering Party or any other person to whom such documents were made available by the Discovering Party, shall be returned to the Producing Party or destroyed by the Discovering Party, at

the option of the Producing Party. If the Producing Party elects the option of return, the postage for such return shall be paid by the Producing Party. If the Producing Party elects the option of destruction, the Discovering Party shall file and serve a sworn certificate of destruction, attesting to the Discovering Party's full compliance with the destruction requirement.

5. This order does not authorize the filing of any documents under seal. Documents may be sealed only if authorized by statute, rule, or order of the Court. A party seeking to file under seal any paper or other matter in any civil case pursuant to this section shall file and serve a motion or stipulation that sets forth (i) the authority for sealing; (ii) an identification and description of each item proposed for sealing; (iii) the reason that sealing each item is necessary; (iv) the reason that a means other than sealing is not available or unsatisfactory to preserve the interest advanced by the movant in support of the seal; and, if a party files a motion *only*, (v) a memorandum of legal authority supporting the seal. See [Local Rule 5.3](#). No party shall file or otherwise tender to the Clerk any item proposed for sealing unless the Court has entered an order allowing filing under seal.

6. Whenever a motion or stipulation to seal is filed, the party seeking to file under seal shall submit a proposed order which states the particular reason the seal is required. The proposed order shall be submitted via the link located under the “Utilities” section of CM/ECF.

7. This Order may be modified upon written stipulation of the parties, or by the Court upon Motion of any party, for good cause shown.

/s/Matthew F. Leitman
MATTHEW F. LEITMAN
UNITED STATES DISTRICT JUDGE

Dated: November 25, 2019

Stipulated and Agreed to by:

s/ Margaret T. Debler
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